

DAVID A. HUBBERT
Deputy Assistant Attorney General

DANIEL A. APPLEGATE
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 7238, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 353-8180
Fax: (202) 514-6770
daniel.a.applegate@usdoj.gov

Of Counsel:
S. LANE TUCKER
United States Attorney

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) Case No. 3:23-cv-260-JMK
)
 ANNA M. RIEZINGER-VON REITZ a/k/a)
 ANNA MARIA RIEZINGER a/k/a ANNA M.)
 BELCHER,)
)
 Defendant.)

MOTION FOR CLERKS' ENTRY OF DEFAULT JUDGMENT

The United States moves for entry of default judgment by the Clerk of the Court pursuant to Fed. R. Civ. P. 55(b)(1) in favor of the United States and against Anna M. Riezinger-Von Reitz for federal income tax liabilities assessed against Anna M. Riezinger-Von Reitz, along with accrued interest and statutory additions and fees, for tax

years 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009. Judgment should be entered against Anna M. Riezinger-Von Reitz in the amount of \$1,224,549.41 plus interest and any other statutory additions accruing after May 10, 2024. In support of this request, the United States submits the following:

1. The Clerk of the Court entered the default of Anna M. Riezinger-Von Reitz on April 18, 2024, for her failure to timely answer or otherwise respond to the complaint filed in this matter. (ECF No. 8.)
2. The claim of the United States is for a sum certain or a sum that, by computation, can be made certain.
3. Upon information and belief, Anna M. Riezinger-Von Reitz is not an infant or an incompetent person, and Anna M. Riezinger-Von Reitz is not currently on active military duty. (*See* Declaration of Daniel Applegate at ¶ 1 and Ex. A.)
4. The amount of the judgment to be entered against Anna M. Riezinger-Von Reitz, as identified in Count I of the Complaint and with the balance owed as of May 10, 2024 as indicated in the attached declaration of Internal Revenue Service Revenue Officer Farrell Stevens, is justly due and owing.

Therefore, the United States requests that the Clerk of the Court, pursuant to Fed. R. Civ. P. 55(b)(1), enter judgment in favor of the United States and against Anna M. Riezinger-Von Reitz in the amount of \$1,224,549.41 plus statutory interest and additions accruing after May 10, 2024 on Count I of the Complaint.

Dated: May 10, 2024

Respectfully submitted,

DAVID A. HUBBERT
Deputy Assistant Attorney General

s/ Daniel A. Applegate
DANIEL A. APPLEGATE
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 7238, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 353-8180
Fax: (202) 514-6770
daniel.a.applegate@usdoj.gov

Of Counsel:
S. LANE TUCKER
United States Attorney
Attorneys for the United States of America

CERTIFICATE OF SERVICE

I certify that the foregoing Motion for Clerk's Entry of Default Judgment was filed through the Court's CM/ECF system and served on May 10, 2024 by first class United States mail, postage prepaid, to the following:

Anna M. Riezinger-Von Reitz
P.O. Box 520994
Big Lake, Alaska 99652

Anna M. Riezinger-Von Reitz
2390 South Park Rd.
Big Lake, Alaska 99652

s/ Daniel A. Applegate
DANIEL A. APPLEGATE
Trial Attorney, Tax Division